

REMARKS

Applicant has carefully reviewed the Application in light of the Office Action mailed October 2, 2007 ("Office Action"). At the time of the Office Action, Claims 1-28 were pending and rejected in the Application. Applicant respectfully requests reconsideration of the pending claims and favorable action in this case.

Section 103 Rejection

The Examiner rejects Claims 1-28 under 35 U.S.C. §103(a) as being unpatentable over U.S. Patent Publication No. 2002/0146000 A1 issued to Jonsson et al. (hereinafter *Jonsson*) in view of U.S. Patent Publication No. 2003/0185230 issued to Fisher, et al. (hereinafter "*Fisher*"). This rejection is respectfully traversed for the following reasons.

First, recall that Independent Claim 1 recites:

An apparatus for compressing data, comprising:
a cell site element associated with a base transceiver station and operable to receive a packet communicated by a mobile station and to extract a high-level data link control (HDLC) payload from the packet, wherein the cell site element is further operable to perform a compression process on the HDLC payload in order to reduce a number of bytes associated with the packet, the cell site element being further operable to build a key that maps the HDLC payload associated with the packet to the key, the key being broken into segments that are positioned into a source internet protocol (IP) address field, a user datagram protocol (UDP) source port field, and a UDP destination port field of a UDP packet, the UDP packet being sent to a routing functionality of the cell site element such that it may be directed to a next destination.

Jonsson is offered for teaching some of the preliminary limitations of this claim, namely: "...a cell site element associated with a base transceiver station and operable to receive a packet communicated by a mobile station and to extract a high-level data link control (HDLC) payload from the packet." But *Jonsson* does not even address the HDLC protocol. In fact, *Jonsson* makes no reference, overture, or insinuation that it is even capable of accommodating HDLC data.

Fisher is brought in for the second underlined portion, highlighted above. But nowhere in *Fisher* is there any of the items circumscribed by Independent Claim 1. Applicant is genuinely confused. Specifically, Applicant respectfully requests the Examiner to identify the relevant sections in the following paragraphs that teach these limitations. Note that the following paragraphs are the very ones cited by the Examiner in the OA on page 3.

[0049] In some embodiments of the invention, front end unit 102 performs data pump (DP) tasks and upper layer unit 106 performs error correction (EC) and data compression (DC) tasks. Signals transmitted from client modem 104 which represent data bits are demodulated by front end unit 102 into data bits. The demodulated data bits are optionally encapsulated into packets and/or into any other format required by the communication link 108 connecting the front end unit 102 to upper layer unit 106. The encapsulated packets are optionally transmitted on a packet connection (e.g., UDP or TCP) on communication link 108 to upper layer unit 106. Upper layer unit 106 removes the encapsulation from the packets it receives and performs EC and DC tasks on the bits extracted from the packets...

[0062] In some embodiments of the invention, front end unit 102 and upper layer unit 106 handle their control signals independently, without receiving information and/or instructions from the other unit. Alternatively or additionally, one or more of units 102 and 106 receives information and/or instructions from the other unit and accordingly generates at least one of its control signals.

[0063] In some embodiments of the invention, front end unit 102 performs data pump (DP) and HDLC tasks while upper layer unit 106 performs LAPM and data compression (DC) tasks.

[0064] Signals transmitted from client modem 104 which represent data are demodulated by front end unit 102 into data bits. Padding flags and the CRC field are removed from the demodulated data bits, and erroneous frames are discarded. The resulting frames are encapsulated and forwarded to upper layer unit 106, using any of the encapsulation methods described above. Upper layer unit 106 acknowledges the receipt of the frames and exchanges flow control commands (e.g., retransmission requests, buffer full notices) with client modem 104. Upper layer unit 106 also decompresses the data bits extracted from the frames.

[0065] Data bits transmitted to computer 112 are received by upper layer unit 106 through gateway 110. The received data bits are compressed by upper layer unit 106 and are broken into frames to which flow control commands are annexed. The frames are encapsulated and transmitted to front end unit 102. Front end unit 102 removes the encapsulation, performs flag padding and adds a CRC field to the frames in accordance with the HDLC layer tasks. Front end unit 102 then modulates the bits and transmits the modulated data signals to client modem 104.

Again, these underlined limitations are explicitly recited in Independent Claim 1, yet there is no reference that discloses these items. Therefore, because all of these missing limitations are found in Independent Claim 1, none of the cited references could possibly inhibit the patentability of the pending claims. Thus, for at least the reasons outlined above, Independent Claim 1 is clearly allowable over the cited references. All of the other

Independent Claims include similar limitations and, thus, are also allowable over these references for analogous reasons. In addition, their respective dependent claims are allowable using a similar rationale. Notice to this effect is respectfully requested.

CONCLUSION

Applicant has now made an earnest attempt to place this case in condition for immediate allowance. For the foregoing reasons and for all other reasons clear and apparent, Applicant respectfully requests reconsideration and allowance of the pending claims.

Applicant believes no fee is due. However, if this is not correct, the Commissioner is hereby authorized to charge any amount required or credit any overpayment to Deposit Account No. 02-0384 of BAKER BOTTS L.L.P.

If there are matters that can be discussed by telephone to advance prosecution of this application, Applicant invites the Examiner to contact Thomas J. Frame at 214.953.6675.

Respectfully submitted,

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